

### Changes in 12/16/05 Revision of FAQs

FAQ	Question	Change
1.2	Who must comply with the rule?	Reference to compliance deadlines for different categories was deleted. They do not affect who must comply.
2.9	If a pipeline subject to 195.452 is sold, does the new operator “inherit” integrity management plans and deadlines from the original operator?	Revised to reflect that deadlines for identifying segments that can affect HCAs have passed for all pipeline categories
2.11	If a pipeline transports both gas and liquids (e.g., some off shore lines), does the hazardous liquid integrity management rule apply, or does the gas integrity management rule apply?	Reference to forthcoming gas IM rule changed to reference rule as published
3.1	When must pipeline segments subject to the rule be identified?	Deleted. All segment identification deadlines have passed.
3.9	When must newly-identified HCAs be included in the program?	Cross-reference to FAQ 13.8 added
3.10	On what frequency or schedule will changes to the HCA maps on the National Pipeline Mapping System be made? Will PHMSA Pipeline Safety announce or provide public notice of changes?	Intention to update USA maps every five years deleted.
3.22	The National Pipeline Mapping System (NPMS) does not contain maps for ecological USAs in Pennsylvania. Are operators responsible for identifying USAs in Pennsylvania?	Revised to delete reference to New York, since USA maps in NPMS are now complete for NY
4.1	What is an assessment?	Adds external corrosion direct assessment as acceptable method
4.4	When must baseline assessments be completed?	Revised to reflect that 50% complete deadlines have passed for all pipeline categories
4.8	The rule does not require the Baseline Assessment Plan to be developed until March 31, 2002; however integrity assessments performed since January 1, 1996 can be used to satisfy the baseline integrity assessment requirement. Will operators be penalized for using prior assessments as a baseline assessment if their risk analysis determines that some of these segments may be lower risk than segments which have yet to be assessed?	Deleted. 50% deadlines, to which the reference to lower-risk segments applies, have passed.
4.9	Will operators need to seek waivers from PHMSA Pipeline Safety In order to change assessment schedules after the initial Baseline Assessment Plan has been developed?	Reference to 50% deadlines deleted, as all have passed.
4.12	The rule requires that 50% of the line pipe that can affect HCAs must have been assessed by September 30, 2004 for category 1 pipe and August 16, 2005 for category 2 pipe. For purposes of determining the 50% mileage criteria, does an operator use the total mileage that has been and will be assessed, or just the mileage that has been determined as having the ability to impact an HCA? (For example, most operators who use internal inspection, will pig a greater distance than just the portion of the pipeline that can affect an HCA.)	Deleted, as 50% deadlines have passed

4.13	For purposes of meeting the deadlines for completing baseline assessments, is the date of the assessment considered to be the day when the tool run is complete, when the preliminary data is received, or when the evaluation of the in-line inspection results is complete?	Completion reference for external corrosion direct assessment added. Revised to note that 180-day discovery deadline applies to individual ILI tool runs.
4.15	If an operator develops a single Baseline Assessment Plan that covers both intra- and interstate pipelines, does the need to complete assessments on 50% of the pipeline mileage that can affect HCAs apply to both intra- and interstate line segments, or just interstate line segment mileage? Should the company's Plan identify whether line segments are intra- or interstate?	Revised for clarity
4.18	What specificity does PHMSA Pipeline Safety expect for schedules in baseline assessment plans?	Specific expectations deleted. PHMSA expects to see a viable, active planning and scheduling process
5.1	How often must periodic integrity assessments be performed on pipeline segments that can affect an HCA after the baseline assessment is completed?	Need for selected interval to be technically defensible is added.
5.8	The gas transmission integrity management rule includes a provision for waiver of reassessment intervals if necessary to maintain product supply. Is PHMSA Pipeline Safety considering/willing to extend the same or similar provisions to hazardous liquids operators? How would such considerations be handled?	Revised to reflect gas transmission IM rule as published
5.10	What is the difference between the "periodic evaluation" required by 195.452 (j) (2) and the process for determining reassessment intervals required by 195.452 (j) (3)?	Added
6.1	What are acceptable integrity assessment methods?	External corrosion direct assessment added
6.15	A reduction in operating pressure can provide an equivalent level of safety as that provided by a Subpart E hydrostatic test. Is a pressure reduction an acceptable integrity assessment method?	Revised for clarity
6.16	Will PHMSA Pipeline Safety allow liquid operators to use the Direct Assessment process allowed in the gas transmission integrity management rule as an acceptable "other technology" for integrity assessment [see 195.452 (c) (i) (C)]?	Revised to reflect rule change adding external corrosion direct assessment as an acceptable assessment method
7.1	Do the anomaly repair schedule requirements in 195.452 (h) apply to ALL previous internal inspection runs performed by the operator, or just the integrity assessments required by 195.452 (i.e., the baseline assessment and subsequent integrity	Reference to FAQ 7.13 added

	assessments)?	
7.4	What is an 'immediate repair condition'?	Pressure must be reduced as soon as safety allows and operation must be at or below the reduced pressure until a repair is made
7.20	Is a 20 percent reduction in pressure an adequate interim measure for immediate repair conditions?	Reference to FAQs 7.15 and 7.22 added
8.3	Will PHMSA Pipeline Safety prepare templates for Baseline Assessment Plans or Integrity Management Program Frameworks that operators can use?	Deleted. Deadlines for preparing baseline assessment plans have passed.
8.4	What is the difference between an acceptable Integrity Management Framework and a fully developed Integrity Management Program?	Deleted. Operators are expected to have progressed beyond the framework stage.
9.3	What criteria will OPS use to determine whether an operator's evaluation of the need for EFRDs is satisfactory?	Repetition of analysis factors in the rule deleted
9.5	What is the minimum acceptable leak detection system in order to comply with 195.452 (i) (3), which states "an operator must have a means to detect leaks on its pipeline system."?	Repetition of analysis factors in the rule deleted. Reference to FAQ 9.4 added.
10.5	Will Integrity Management Program inspections be scheduled in advance?	Deleted. With first round inspections nearing completion (only small operators remain), this question is considered moot.
10.12	Will integrity management inspection results on a company be publicly available?	Reference to consideration of making summary level information on industry performance available deleted.
10.15	How will PHMSA Pipeline Safety ensure consistency in enforcing integrity management requirements?	Revised to reflect actions currently being taken.
11.7	If an operator develops a single Baseline Assessment Plan that covers both intra- and interstate pipelines, does the need to complete assessments on 50% of the pipeline mileage that can affect HCAs apply to both intra- and interstate line segments, or just interstate line segment mileage?	Deleted. Rendered moot with passage of 50% deadlines.
12.1	What types of notifications are required by the rule?	Revised to note that external corrosion direct assessment is an accepted assessment method, not "other technology".
12.3	When must notifications be submitted?	Deleted. Adds no information beyond requirements in rule
12.5	How can notifications be submitted?	Reflect current web portal for on-line submissions
12.7	How will an operator know if PHMSA Pipeline Safety objects to its notification?	Answer expanded to reflect current means of responding to notifications

12.8	How will an operator know if PHMSA Pipeline Safety has no objections to its notification?	Deleted. Incorporated in 12.7
13.1	How do operators obtain information about the location of high consequence areas now that National Pipeline Mapping System (NPMS) information is no longer publicly available on the internet?	URL (web address) revised
13.4	When will OPS require operators who have not supplied their system maps to the National Pipeline Mapping System to provide this data?	Deleted. Action has been completed
13.9	When does OPS expect to update the National Pipeline Mapping System?	Reference to “recent” updates deleted, as those updates occurred in 2003.
Misc.	Category 14, Miscellaneous, has been deleted. Questions previously in this category have been relocated as shown.	14.1 is now 7.23 14.2 is now 1.5 14.3 is now 1.6 14.4 is now 1.7 14.5 has been deleted (see below) 14.6 is now 8.18 14.7 is now 8.19 14.8 is now 10.16
14.5	API-1160 was recently approved. What process will OPS use to determine whether to adopt or reference portions or all of this standard in 195? Does OPS intend to reference API-1160, or replace Appendix C with API-1160? On what time frame can the industry expect this decision to be made?	Deleted. PHMSA will post any future adoptions of API 1160 on its web site and the Federal Register, as appropriate.